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March 29, 2022

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**VIA ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Elvin German*  
21 Cr. 245 (ER)**

Dear Judge Ramos:

Please recall that I represent Mr. Elvin German in the above-referenced matter. Mr. German is presently scheduled for sentencing before Your Honor on April 13, 2022 at 3:30 p.m., and per Your Honor's Individual Rules, the defense's sentencing submission is due Wednesday, March 30, 2022. For the reasons that follow, the defense writes on behalf of the parties to jointly request that Your Honor grant a two-week adjournment of the sentencing hearing and adjust the parties' respective sentencing submission deadlines accordingly. This is the defense's second sentencing hearing adjournment request in this matter.

The defense is substantially finished preparing its sentencing letter; however, we are still lacking some proof that Mr. German has been diligently working to obtain, including important records concerning his minor child, as well as materials related to his employment record. We have been assured that we will receive these important materials by the end of this week. In addition, A.U.S.A. Kudla has advised that she will be out of the country during the scheduled sentencing date, and she would like to personally appear on this matter.

Therefore, I respectfully request a two-week adjournment of Mr. German's sentencing hearing until the week of April 25, 2022, as A.U.S.A. Kudla has advised that she is unavailable April 11 through April 18, 2022. Further, I respectfully request that the due dates for the parties' respective sentencing submissions be adjusted to correspond with Mr. German's new anticipated sentencing date and in accordance with Your Honor's Rules. Thank you for your consideration.

Respectfully submitted,

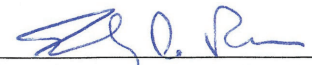


Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Danielle Kudla (via ECF)  
Mr. Elvin German (via email)

Sentencing is adjourned to April 29, 2022 at 11 a.m.  
Sentencing submission deadlines are extended accordingly.  
SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 3/30/2022  
New York, New York